

Exhibit 16

GOLDFARB ABRANDT

SALZMAN & KUTZIN^{LLP}

Attorneys at Law

David Goldfarb
Jeffrey G. Abrandt
Ira Salzman
Michael S. Kutzin
Mary E. Granfort
David I. Kronenberg
David J. Choyne
Matthew Carmody

350 Fifth Avenue, Suite 4310
New York, New York 10118
Phone: 212 387-8400
Fax: 212 387-8404
www.seniorlaw.com

170 Hamilton Avenue, Suite 301
White Plains, New York 10601
Phone: 914 397-0900

Please reply to the
New York City office

January 25, 2016

VIA EMAIL AND REGULAR MAIL

The Honorable Thomas P. Aliotta
Supreme Court, Richmond County
26 Central Avenue, Park 12G
Staten Island, New York 10301

Re: Guardianship of Joanne Black
Index No.: 80253/14

Dear Justice Aliotta:

I am the attorney for Joanne Black, the person who is the subject of this proceeding. I am writing to request, pursuant to Mental Hygiene Law § 83.11(b) that you permit testimony of a witness in Colorado by telephone, Facetime or Skype at the hearing that is scheduled with regard to this matter on February 8, 2016.

At this hearing the court will be asked to determine, among other things whether distributions from the Estate of Renata Black and two trusts established by her should be enjoined pending further proceedings in Surrogate's Court, Westchester County. In order to establish the need for this relief I would like to be able to show that the funds in the Estate and trusts have been seriously mismanaged, to the detriment of my client.

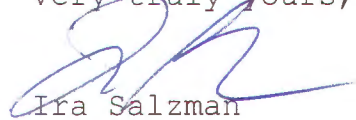
In order to prove the mismanagement that has occurred I would like to offer the testimony of Ms. Pamela Kerr. Ms. Kerr is the forensic accountant appointed by the Probate Court in Colorado to investigate this case. She has done an extensive analysis of the receipts and disbursements in all of the

entities that are the subject of this proceeding. I would like to offer her testimony to show how much money appears to be missing at this time.

Ms. Kerr is based in Colorado and I would like to offer her testimony by telephone, Facetime or Skype. She testified in the Colorado proceeding and she is familiar to counsel for Bernard Black.

Thank you for your consideration of this request.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Ira Salzman', is written over the typed name.

Ira Salzman

cc: **[By Email]**

Bart Russo, Esq.

Anthony Dain, Esq.

Piper Hoffman, Esq.

Melissa Cohenson, Esq.